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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF LINDSAY COOPER  
24 IN SUPPORT OF PLAINTIFF WAYMO  
25 LLC'S ADMINISTRATIVE MOTION TO  
26 FILE UNDER SEAL ITS RESPONSE TO  
27 DEFENDANTS' BRIEF RE UNJUST  
28 ENRICHMENT PER THE COURT'S  
ORDER (DKT. 2409)**

29 UBER TECHNOLOGIES, INC.;  
30 OTTOMOTTO LLC; OTTO TRUCKING  
31 LLC,  
32 Defendants.

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45 CASE No. 3:17-cv-00939-WHA

46 COOPER DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal confidential information in its December 19, 2017 Response to the Court’s Order Requiring  
 8 Response to Defendants’ Brief Re Unjust Enrichment (“Waymo’s Administrative Motion”).  
 9 Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Response	Highlighted in Blue	Defendants

10       3. Waymo’s Response (portions highlighted in blue) contain information that Defendants  
 11 have designated as confidential and/or highly confidential.

12       4. Waymo takes no position on the merits of sealing Defendants’ designated material, and  
 13 expects Defendants to file one or more declarations in accordance with the Local Rules.

14       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
 15 true and correct, and that this declaration was executed in San Francisco, California, on December 19,  
 16 2017.

17       By /s/ Lindsay Cooper

18                   Lindsay Cooper  
 19                   Attorneys for WAYMO LLC

1                   **SIGNATURE ATTESTATION**

2                   Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
3 filing of this document has been obtained from Lindsay Cooper.

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5                   */s/ Charles K. Verhoeven*  
6                   Charles K. Verhoeven  
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